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Attorneys for Defendant, Douglas M. Courson

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

CASE NO.: 2:22-cr-00030-RFB-DJA

Plaintiff,

vs.

KRISTOPHER LEE DALLMANN,

DOUGLAS M. COURSON,

FELIPE GARCIA,

JARED EDWARD JAUREQUI,  
a/k/a Jared Edwards,

PETER H. HUBER,

YOANY VAILLANT,  
a/k/a Yoany Vaillant Fajardo,

Defendants.

**AMENDED STIPULATION AND ORDER TO CONTINUE SENTENCINGS (SECOND REQUEST)<sup>1</sup>**

**IT IS HEREBY STIPULATED** by and between Defendant, **Douglas Courson**, by and through his counsel, Paola M. Armeni, Esq. and Austin Barnum, Esq. of the law firm of Clark Hill PLLC, Defendant, **Kristopher Lee Dallmann**, by and through his counsel Joshua Tomshek, Esq. and Jason F. Carr, Esq. of the Hofland and Tomsheck law firm, Defendant **Felipe Garcia**, by and through his counsel William H. Brown, Esq. and Christopher Mishler, Esq., of the Brown Mishler,

<sup>1</sup> First request for Mr. Vaillant.

1 PPC law firm Defendant, **Jared Edward Jaurequi**, by and through his counsel Russell Marsh,  
 2 Esq., of the Wright Marsh & Levy law firm, Defendant **Peter H. Huber**, by and through his  
 3 counsel Kathleen Bliss, Esq. of the Kathleen Bliss law firm, and **Yoany Vaillant**, by and through  
 4 his counsel Christopher Oram of Christopher Oram Law, the Plaintiff, United States of America,  
 5 by and through Jason M. Frierson, United States Attorney, Jessica Olivia, Assistant United States  
 6 Attorney, Matthew A. Lamberti, Senior Counsel, and Michael Christin, Esq. that the sentencing  
 7 hearings for all defendants currently scheduled for February 3, 2025 for Kristopher Dallmann,  
 8 Felipe Garcia, and Douglas Courson, and February 4, 2025 for Jared Jaurequi, Peter Huber, and  
 9 Yoany Vaillant be vacated and **rescheduled to the week of April 7, 2025 or April 14<sup>th</sup>-16<sup>th</sup>,**  
 10 **2025.**

11 This Stipulation is entered into for the following reasons:

12 1. On October 21, 2024, this Court appointed Joshua Tomscheck, Esq. as counsel for  
 13 Dallmann. (*See* ECF No. 593.) On December 4, 2024, this Court appointed the declarant, Jason  
 14 F. Carr, Esq., as co-counsel for Dallmann. (*See* ECF No. 652.)

15 2. Dallmann's counsel believes that the press of business has impaired efforts to  
 16 prepare for sentencing and otherwise determine whether any other motions or legal action is  
 17 appropriate.

18 3. That press of business includes a capital trial in *State v. Newton*, C-17-322777-1.  
 19 The first trial setting in this matter occurred on November 4, 2024, and ended in a mistrial on  
 20 November 8, 2024. The trial began again on January 7, 2025. That trial and capital sentencing, if  
 21 applicable, will likely last at least another full week.

22 4. Other matters that interfere with preparing for Mr. Dallmann's sentencing in this  
 23 complex matter include: A Motion to Dismiss Counts for Extradition Treaty Violations, due on  
 24 January 21, 2025 in *State v. Colon*, 23-cr-007257; a hearing in *Bishop-Renteria v. City of*  
 25 *Henderson*, C-24-386703-A on January 22, 2025; a Reply Brief due in *State v. Brown*, Nev. Sup.  
 26 Ct. No. 88464 on January 24, 2025; and a traverse due on January 30, 2025 in *Kemp v. State*, A-  
 27 22-852239-W.  
 28

1           5. Mr. Carr has a hearing in a federal civil case, *Beauregard v. Sampson*, 2:20-cv-02123-  
2 KJD-NJK, set for February 11, 2025.

3           6. Defendants, Kristopher Dallmann, Douglas Courson, Felipe Garcia, Jared Jaurequi,  
4 Peter Huber and Yoany Vaillant have appeared in this case, and are not in custody and, along with  
5 the government, agrees to this continuance. All defense counsel represent that their clients agree  
6 to this continuance.

7           7. All parties believe that it would be most efficient and reasonable for Mr. Dallmann as the  
8 lead defendant to proceed to sentencing first and thereafter the remaining defendants sentencing  
9 to proceed thereafter.

10          8. The additional time requested herein is not sought for purposes of delay.

11          9. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
12 hearing for good cause. Good cause exists in this case.

13          10. For all the above-stated reasons, the ends of justice would be best served by a continuance  
14 of the sentencing hearings.

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11. This is the second request for a continuance for all defendants except Mr. Vaillant (his first request) of the sentencing hearing.

Dated this 17<sup>th</sup> day of January 2025.

JASON FRIERSON UNITED STATES ATTORNEY DISTRICT OF NEVADA  <u>/s/ Jessica Oliva</u> JESSICA OLIVA Assistant United States Attorney Attorneys for Plaintiff, UNITED STATES OF AMERICA	CLARK HILL PLLC  <u>/s/ Paola M. Armeni</u> PAOLA M. ARMENI Attorney for Defendant, DOUGLAS COURSON
BRENT S. WIBLE Principal Deputy Assistant Attorney General Head of the Criminal Division  <u>/s/ Matthew A. Lamberti</u> MATTHEW A. LAMBERTI Senior Counsel MICHAEL CHRISTIN Trial Attorney United States Department of Justice Attorneys for Plaintiff, UNITED STATES OF AMERICA	BROWN MISHLER, PPC  <u>/s/ William H. Brown</u> WILLIAM H. BROWN CHRISTOPHER MISHLER Attorney for Defendant, FELIPE GARCIA
KATHLEEN BLISS LAW  <u>/s/ Kathleen Bliss</u> KATHLEEN BLISS Attorney for Defendant, PETER HUBER	WRIGHT MARSH & LEVY  <u>/s/ Russell Marsh</u> RUSSELL MARSH Attorney for Defendant, JARED EDWARD JAUREQUI
CHRISTOPHER ORAM LAW  <u>/s/ Christopher Oram</u> CHRISTOPHER ORAM Attorney for Defendant, YOANY VAILLANT	

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Plaintiff,

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YOANY VAILLANT,  
a/k/a Yoany Vaillant Fajardo,

Defendants.

**FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

**CONCLUSIONS OF LAW**

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. On October 21, 2024, this Court appointed Joshua Tomscheck, Esq. as counsel for Dallmann. (*See* ECF No. 593.) On December 4, 2024, this Court appointed the declarant, Jason F. Carr, Esq., as co-counsel for Dallmann. (*See* ECF No. 652.)

2. Dallmann's counsel believes that the press of business has impaired efforts to prepare for sentencing and otherwise determining whether any other motions or legal action is appropriate.

3. That press of business includes a capital trial in *State v. Newton*, C-17-322777-1. The first trial setting in this matter occurred on November 4, 2024, and ended in a mistrial on

1 November 8, 2024. The trial began again on January 7, 2025. That trial and capital sentencing, if  
2 applicable, will likely last at least another full week.

3 4. Other matters that interfere with preparing for Mr. Dallmann's sentencing in this  
4 complex matter include: A Motion to Dismiss Counts for Extradition Treaty Violations, due on  
5 January 21, 2025 in *State v. Colon*, 23-cr-007257; a hearing in *Bishop-Renteria v. City of*  
6 *Henderson*, C-24-386703-A on January 22, 2025; a Reply Brief due in *State v. Brown*, Nev. Sup.  
7 Ct. No. 88464 on January 24, 2025; and a traverse due on January 30, 2025 in *Kemp v. State*, A-  
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15 7. All parties believe that it would be most efficient and reasonable for Mr. Dallmann as the  
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20 hearing for good cause. Good cause exists in this case.

21 10. For all the above-stated reasons, the ends of justice would be best served by a continuance  
22 of the sentencing hearing.

23 11. This is the second request for a continuance for all defendants except Mr. Vaillant (his first  
24 request) of the sentencing hearing.

**ORDER**

**IT IS HEREBY ORDERED** that the sentencing hearings for all defendants currently scheduled for February 2, 2025, namely Kristopher Dallmann, Felipe Garcia, and Douglas Courson and February 4, 2025, namely Jared Jaurequi, Peter Huber and Yoany Vaillant be vacated and continued to the following days and times in Courtroom 7C:

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DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT COURT JUDGE**  
**CASE NO.: 2:22-cr-00030-RFB-DJA**